

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, ex rel. )  
LOUIS LONGO, )

Plaintiff-Relator )

v. )

Case No. 2:17-cv-01654-MJH

WHEELING HOSPITAL, INC., )  
R&V ASSOCIATES, LTD., and )  
RONALD L. VIOLI )

Defendants. )

**DECLARATION OF MICHAEL SCOTT McKEETS**

I, Michael Scott McKeets, hereby declare as follows:

1. I am an adult over the age of eighteen (18) and a resident of the State of Ohio.
2. The information contained in this Declaration is based on my personal knowledge.

If called to testify, I would state as follows:

3. I am the former Chief Operating Officer of Wheeling Hospital ("Hospital) in Wheeling, West Virginia. I retired in December 2018.

4. I live in St. Clairsville, Ohio.

5. While I was employed by the Hospital, I performed the majority of my work at the Hospital's campus in Wheeling, where my office was located.

6. While I was employed by the Hospital, my records and files pertaining to my work were located at the Hospital.

7. If I had to testify at trial or attend other court proceedings in this case, it would be more convenient if the case were in Wheeling, West Virginia because the federal courthouse in Wheeling, located at 1125 Chapline Street, is much closer to my home than the federal courthouse

in Pittsburgh, Pennsylvania.

8. If called to testify in this case, I would likely testify about the Hospital's employment and management of physicians and physician-practice groups, the allegations contained in the Government's Complaint that refer to me, and other aspects of the Hospital's management and operations relating to this case.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 10, 2019  
in Wheeling, West Virginia

  
Michael Scott McKeets